

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	Chapter 11
FTX TRADING LTD., <i>et al.</i> ,)	Case No. 22-11068 (JTD)
Debtors.)	(Jointly Administered)

**NOTICE OF APPEARANCE AND
DEMAND FOR SERVICE OF NOTICES AND PAPERS**

PLEASE TAKE NOTICE that Haynes and Boone, LLP, Brown Rudnick, LLP, and Gellert Scali Busenkell & Brown, LLC hereby appear on behalf of BlockFi Inc., and affiliates, as Wind-Down Debtors of their Chapter 11 Plan (“BlockFi”), and demand, pursuant to Rules 2002, 9007 and 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and Sections 1109(b) and 342 of Title 11 of the United States Code, as amended, that all notices given in the above-captioned cases and all papers served or required to be served in the above-captioned cases be given to and served upon the undersigned attorneys, at the addresses set forth below:

<p>HAYNES and BOONE, LLP Richard Kanowitz 30 Rockefeller Plaza 26th Floor New York, NY 10112 Telephone: (212) 659-7300 Facsimile: (212) 918-8989 Email: Richard.Kanowitz@haynesboone.com</p> <p>Richard D. Anigian Charles M. Jones II 2323 Victory Avenue Suite 700 Dallas, TX 75219 Telephone: (214) 651-5000 Facsimile: (214) 651-5940 Email: Rick.Anigian@haynesboone.com Charlie.Jones@haynesboone.com</p>	<p>GELLERT SCALI BUSENKELL & BROWN, LLC Michael Busenkell, Esq. 1201 North Orange Street, Suite 300 Wilmington, Delaware 19801 Telephone: (302) 425-5812 Facsimile: (302) 425-5814 Email: mbusenkell@gsbblaw.com</p>
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<p>BROWN RUDNICK LLP Kenneth J. Aulet, Esq. Jeffrey L. Jonas, Esq. Michael Winograd, Esq. Alexander F. Kasnetz, Esq. Seven Times Square New York, NY 10036 Telephone: (212) 209-4800 Fax: (212) 209-4801 Email: kaulet@brownrudnick.com jjonas@brownrudnick.com mwinograd@brownrudnick.com akasnetz@brownrudnick.com</p> <p>Tristan G. Axelrod, Esq. Shari I. Dwoskin, Esq. Matthew A. Sawyer, Esq. One Financial Center Boston, Massachusetts 02111 Telephone: (617) 856-8200 Facsimile: (617) 856-8201 Email: taxelrod@brownrudnick.com sdwoskin@brownrudnick.com msawyer@brownrudnick.com</p>	
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PLEASE TAKE FURTHER NOTICE that this constitutes not only a request for service of the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, a request for service of all orders and notices of any application, motion, petition, pleading, request, complaint, or demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, courier service, hand delivery, telephone, facsimile transmission, telegraph, telex, or otherwise, that (1) affects or seeks to affect in any way any rights or interests of any creditor or party in interest in this case, with respect to (a) the debtor in the above-captioned case (the “Debtor”) and any related adversary proceedings, whether currently pending or later commenced; (b) property of the Debtor’s estates, or proceeds thereof, in which the Debtor may claim an interest; or (c) property or proceeds thereof in the possession,

custody, or control of others that the Debtor may seek to use; or (2) requires or seeks to require any act or other conduct by a party in interest.

PLEASE TAKE FURTHER NOTICE that this notice of appearance and any subsequent appearance, pleading, claim, or suit is not intended nor shall be deemed to waive the rights of BlockFi: (1) to have an Article III judge adjudicate in the first instance any case, proceeding, matter, or controversy as to which a bankruptcy judge may not enter a final order or judgment consistent with Article III of the United States Constitution; (2) to have final orders in a non-core case, proceeding, matter, or controversy entered only after an opportunity to object to proposed findings of fact and conclusions of law and a *de novo* review by a district court judge; (3) to trial by jury in any case, proceeding, matter, or controversy so triable; (4) to have the reference withdrawn by the United States District Court in any case, proceeding, matter, or controversy subject to mandatory or discretionary withdrawal; or (5) any other rights, claims, actions, defenses, setoffs, or recoupments to which BlockFi is or may be entitled under agreements, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments expressly are hereby reserved. For the avoidance of doubt, filing this notice is not intended as, and shall not be, BlockFi's consent to the entry of final orders and judgments in any case, proceeding, matter, or controversy if it is determined that the Court, absent consent of BlockFi consistent with Article III of the United States Constitution.

Dated: October 25, 2023

**GELLERT SCALI BUSENKELL &
BROWN, LLC**

/s/ Michael Busenkell

Michael Busenkell (DE 3933)
1201 North Orange Street, Suite 300
Wilmington, DE 19801
Telephone: (302) 425-5812
Facsimile: (302) 425-5814
Email: mbusenkel@gsbblaw.com

and

HAYNES and BOONE, LLP

Richard Kanowitz
30 Rockefeller Plaza
26th Floor
New York, NY 10112
Telephone: (212) 659-7300
Facsimile: (212) 918-8989
Email: Richard.Kanowitz@haynesboone.com

Richard D. Anigian
Charles M. Jones II
2323 Victory Avenue
Suite 700
Dallas, TX 75219
Telephone: (214) 651-5000
Facsimile: (214) 651-5940
Email: Rick.Anigian@haynesboone.com
Charlie.Jones@haynesboone.com

and

BROWN RUDNICK LLP

Kenneth J. Aulet, Esq.
Jeffrey L. Jonas, Esq.
Michael Winograd, Esq.
Alexander F. Kasnetz, Esq.
Seven Times Square
New York, NY 10036
Telephone: (212) 209-4800
Fax: (212) 209-4801
Email: kaulet@brownrudnick.com
jjonas@brownrudnick.com
mwinograd@brownrudnick.com
akasnetz@brownrudnick.com

Tristan G. Axelrod, Esq.
Shari I. Dwoskin, Esq.
Matthew A. Sawyer, Esq.
One Financial Center
Boston, Massachusetts 02111
Telephone: (617) 856-8200
Facsimile: (617) 856-8201
Email: taxelrod@brownrudnick.com

sdwoskin@brownrudnick.com
msawyer@brownrudnick.com

*Counsel for BlockFi Inc. and affiliates as Wind-
Down Debtors of their Chapter 11 Plan*